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October 25, 2021

Via ECF

The Honorable Judge Vernon S. Broderick Southern District of New York 40 Foley Square New York, NY 10007 APPLICATION GRANTED SO ORDERED A. VERNON S. BRODERICK U.S.D.J. 10/26/2021

Re: Milton Williams v. Bloomingbulb.com, Case No. 1:21-cv-04886

Dear Judge Broderick:

We represent Defendant Bloomingbulb.com ("Defendant") in the above-referenced matter. Together with counsel for Plaintiff, we jointly and respectfully move this Court to stay all case deadlines in this action for forty-five (45 days), from October 25, 2021 to December 9, 2021.

This requested stay will permit the parties to finalize their efforts to bring about the voluntary dismissal of all claims asserted in this action without further litigation. Once those efforts are complete, the parties will file a stipulation of voluntary dismissal.

Sincerely,

DENTONS COHEN & GRIGSBY P.C.

/s/ Lucy E. Hill

By: Lucy E. Hill

LEH/chl

Copy to: All counsel of record (via ECF)

Davis Brown ▶ East African Law Chambers ▶ Eric Silwamba, Jalasi and Linyama ▶ Durham Jones & Pinegar ▶ LEAD Advogados ▶ Rattagan Macchiavello Arocena ▶ Jiménez de Aréchaga, Viana & Brause ▶ Lee International ▶ Kensington Swan ▶ Bingham Greenebaum ▶ Cohen & Grigsby ▶ Sayarh & Menjra ▶ Larraín Rencoret ▶ For more information on the firms that have come together to form Dentons, go to dentons.com/legacyfirms